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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

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CLERK U.S. DISTRICT COURT
TAMPA, FLORIDA

UNITED STATES OF AMERICA

vs.

Case No. 8:03-CR-77-T-30TBM

GHASSAN ZAYED BALLUT

**EX PARTE MOTION FOR ORDER PERMITTING
PARALEGAL TO MEET WITH DEFENDANT SAMI AL-ARIAN**

The Defendant, GHASSAN ZAYED BALLUT, by and through his undersigned counsel, requests this Honorable Court to issue its Order directing the Federal Correctional Center at Coleman, Florida (FCC-USP), to permit and make arrangements for the Court-appointed paralegal, Brooke Elvington, to enter FCC-USP from time to time for the purpose of conferring with and providing discovery materials to the Defendant, SAMI AL-ARIAN, and as grounds therefor would state:

1. The pro se Defendant, SAMI AL-ARIAN, is currently housed in the Special Housing Unit (SHU) at FCC-USP, under the most restrictive security, as has previously been made known to the Court.

2. The security system at FCC-USP scrutinizes and limits the access of visitors to SAMI AL-ARIAN and restricts the provision of materials and documents to him by visitors.

3. Pursuant to a motion previously filed by the Defendant, GHASSAN BALLUT, and granted by the Court, the paralegal, Brooke Elvington, has been appointed and assigned by the Court in accordance with to 18 U.S.C. § 3006A to assist all Defendants and their counsel to facilitate the discovery process with the exception of Defendant SAMEEH HAMMOUDEH, who

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has retained and is represented by private counsel.

4. The paralegal has created very substantial work product summarizing the review of financial records provided as discovery in this case which is to be shared by the designated Defendants in this case, and as part of her duties she is required to provide a copy of this work product to SAMI AL-ARIAN and discuss her summary with him, which necessitates meeting personally with SAMI AL-ARIAN at FCC-USP.

5. The paralegal anticipates additional meetings with SAMI AL-ARIAN at FCC-USP to discuss this and additional work product in the foreseeable future as discovery progresses.

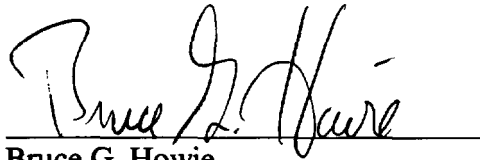
6. Without sufficient credentials and authority, the paralegal is reasonably concerned that the personnel at FCC-USP will prevent or substantially limit the paralegal's access to SAMI AL-ARIAN and her ability to provide and discuss work product with him.

7. The paralegal reasonably believes that an Order from this Court directing the personnel at FCC-USP to permit the paralegal to meet with and provide materials to SAMI AL-ARIAN will facilitate the paralegal's ability to carry out her duties.

8. The paralegal is an active member of the Florida Bar and an experienced criminal defense attorney, and she is familiar with the protocol and practices of detention and correctional facilities and will conform herself to the requirements and restrictions imposed by FCC-USP.

WHEREFORE, the Defendant requests this Honorable Court for an appropriate Order directing the authorities at FCC-USP to permit the paralegal, Brooke Elvington, to meet and confer with SAMI AL-ARIAN from time to time and to provide him with copies of work product materials.

Respectfully submitted,



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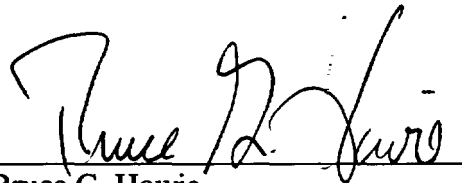
Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by U.S.

Mail to the following this 21st day of October, 2003:

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